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March 10, 2003

Chairman Tony Grippa and
Members, Board of County Commissioners
Leon County Courthouse
302 S. Monroe Street
Tallahassee, FL 32301

* Chairman Reginald L. Bouthillier, Jr., and
Members, Tallahassee-Leon County Planning Commission
Greenberg Traurig
P.O. Drawer 1838
Tallahassee, FL 32302

Re: *Proposed Inclusionary Housing Ordinance*

Dear Chairman Grippa:

On behalf of the Greater Tallahassee Chamber of Commerce, Inc., I am writing to respectfully request that the Board of County Commissioners and the Tallahassee-Leon County Planning Commission not adopt the proposed "inclusionary housing" ordinance, and that they take additional steps before implementing County Housing Policies 1.3.6, 1.3.7 and 1.3.8.

The Chamber has concluded that the interests of the community would be best served by rejection of the proposed implementing ordinance, and by further analysis and review of implementation options with particular emphasis on market-based strategies. While we appreciate that a variety of constituencies -- including the Chamber -- were involved in early stages of work on this proposal, we do not believe the final work product scheduled for hearings this month represents either a genuine consensus or a public policy which can be reconciled with more urgent public-private initiatives.

We are especially concerned that mandatory "inclusionary housing" is a local government requirement which has not been implemented by any other city or county in Florida. Only Key West has a mandatory inclusionary housing requirement, and your staff report that is has not been implemented. We are concerned that implementation of such a new mandate in our community at this time would send a very negative signal about our local government regulatory climate. Particularly when our community's top priority is -- and ought to be -- the aggressive recruitment of new private-sector payrolls in this time of declining state employment, for our

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county and city governments to pioneer this "command-and-control" approach for affordable housing in Florida seems imprudent.

We are not recommending repeal of County Housing Policies 1.3.6, 1.3.7 or 1.3.8 at this time. We appreciate the need for more affordable housing in the community, and the social benefits from the dispersal of such housing throughout Tallahassee and Leon County. We also acknowledge the social benefits of home ownership. However, the Chamber is not convinced these benefits can be achieved only through imposition of a new regulatory mandate, particularly one which lacks adequate financial support for those in the private-sector who will be forced to provide this low-cost housing.

The Chamber urges the Board of County Commissioners and the Planning Commission to identify and review policy choices for less burdensome and more equitable measures to achieve these goals. The Chamber is especially interested in seeing an incentives-based approach to providing affordable housing in new residential communities. We realize staff has informed you that such approaches have not proven effective elsewhere in Florida. If so, this conclusion may mean that those other communities did not properly design their incentive-based strategies or have underestimated the real cost. In any event, their failures should not be an excuse for our community to adopt this new mandate – particularly when those other communities have not taken that step themselves.

In closing, let me thank you again for allowing the Chamber to participate in the early stages of preparing this ordinance. We welcome the opportunity to provide additional assistance in identifying and reviewing alternative policy choices that will generally meet these policy goals.

Sincerely,



Kim B. Williams
Chairman
Greater Tallahassee Chamber of Commerce

Cc: Chamber Board of Directors
Economic Development Council Board of Directors